

EXHIBIT 1

**UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OHIO
Akron Division**

Drips Holdings, LLC,

Petitioner,

V.

QUOTEWIZARD.COM, LLC,

Respondent.

Misc. Action No. _____

Arising from Civil Action No. 1:19-cv-12235-LTS, pending in the United States District Court for the District of Massachusetts

**DRIPS HOLDING, LLC'S MOTION TO QUASH
SUBPOENA TO PRODUCE DOCUMENTS**

Pursuant to Federal Rules of Civil Procedure 45(d)(3), Drips Holdings, LLC (“Drips”) moves this Court to quash the subpoena issued by QuoteWizard.com LLC on March 2, 2021 (the “Subpoena”).

As detailed in the attached Memorandum of Law, Drips would suffer undue burden if it is required to comply with the Subpoena, which alone warrants quashing the Subpoena under Rule 45(d)(3). Further, requiring Drips to undertake the massively burdensome effort that would be required to collect and produce the requested records at a stage in the proceeding when the records are not yet pertinent, and may never be, is disproportionate to the needs of the case and antithetical to the purposes of the Federal Rule's limits on permissible discovery and the more stringent limitations applicable to nonparty discovery under Rule 45. Accordingly, Drips requests that the Court enter an order quashing the Subpoena in its entirety under Rule 45(d)(3).

Date: March 12, 2021

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CERTIFICATE OF SERVICE

I hereby certify that on March 12, 2021, a copy of the foregoing was served via email to the following counsel of record in the underling matter:

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